

# **EXHIBIT F**

## Admin

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**From:** Owen, Stephen M. <smowen@locklaw.com>  
**Sent:** Monday, July 26, 2021 2:46 PM  
**To:** Kathryn Stephens  
**Cc:** John Rock; Clark, Brian D.; Bourne, Joseph C.; Pouya, Bobby  
**Subject:** RE: In re Pork Antitrust Litigation, No. 18-CV-01776-JRT-HB

Kathryn,

I'm writing to follow up on my July 22 email.

First, while we understand your position about costs (which we believe are actually being paid by Hormel and not your individual clients), we do not agree that Plaintiffs should incur the costs associated with the production of responsive text message content from the current and former employees that Defendant Hormel designated as document custodians.

Second, the search terms and methodology we proposed is reasonably crafted to seek relevant information in light of the nature of the antitrust conspiracy alleged in the underlying action. Spelling, grammar, and content are often less formal and more variable in text messages than other written communications such as emails. Text messages are short and will not take very long for an attorney to review for responsiveness, and the search terms we proposed are designed to filter out purely personal text messages or text messages unrelated to work or the pork industry.

Finally, given our prior telephonic meet and confer and your refusal to image the devices and any cloud backup and run the searches, it appears that we will have to agree to disagree. That said, if you believe further discussion would be helpful, we can make ourselves available for another phone call in the next few days, and ask that you provide a couple dates and times this week when you are available.

Best,  
Steve

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**From:** Owen, Stephen M.  
**Sent:** Thursday, July 22, 2021 4:26 PM  
**To:** 'Kathryn Stephens' <kstephens@rockhutchinson.com>  
**Cc:** John Rock <jrock@rockhutchinson.com>; Clark, Brian D. <bdclark@locklaw.com>; Bourne, Joseph C. <jcbourne@locklaw.com>; Pouya, Bobby <bpouya@pswlaw.com>  
**Subject:** RE: In re Pork Antitrust Litigation, No. 18-CV-01776-JRT-HB

Kathryn,

Thank you for your email. Are you available to discuss sometime on either Monday or Tuesday of next week?

Thank you.

Best,  
Steve

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**From:** Kathryn Stephens <kstephens@rockhutchinson.com>  
**Sent:** Thursday, July 22, 2021 10:53 AM  
**To:** Owen, Stephen M. <smowen@locklaw.com>

**Cc:** John Rock <[jrock@rockhutchinson.com](mailto:jrock@rockhutchinson.com)>; Clark, Brian D. <[bdclark@locklaw.com](mailto:bdclark@locklaw.com)>; Bourne, Joseph C. <[jcbourne@locklaw.com](mailto:jcbourne@locklaw.com)>

**Subject:** RE: In re Pork Antitrust Litigation, No. 18-CV-01776-JRT-HB

Steve,

Thank you for your e-mail. To be clear, my letter of July 16 was an appropriate response to your letter of June 30 which was inconsistent with the message you gave us during the June 1 meet and confer—that your primary concern was preservation of relevant and responsive data, and that you understood the cost burden imaging would place on our individual third-party clients.

We have not taken the position that all imaging and searches based on a reasonably targeted list of search terms is completely unavailable, at least for some portion of our clients. In fact, as we have acknowledged, some of our clients' devices have previously been imaged. We do contend, however, that as third parties to the underlying litigation, our clients should not have to bear the costs associated with any of these processes.

In addition, the list of proposed search terms you provided is extremely overbroad and would necessarily capture information completely unrelated to anything remotely relevant to the underlying litigation.

If you would like to discuss these issues further, please advise as to your availability to conduct a meet and confer in the next couple of weeks.

Best,  
Kathy

Kathy Stephens

Senior Attorney

**ROCK HUTCHINSON**  
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**From:** Owen, Stephen M. <[smowen@locklaw.com](mailto:smowen@locklaw.com)>

**Sent:** Monday, July 19, 2021 3:23 PM

**To:** Kathryn Stephens <[kstephens@rockhutchinson.com](mailto:kstephens@rockhutchinson.com)>

**Cc:** John Rock <[jrock@rockhutchinson.com](mailto:jrock@rockhutchinson.com)>; Clark, Brian D. <[bdclark@locklaw.com](mailto:bdclark@locklaw.com)>; Bourne, Joseph C. <[jcbourne@locklaw.com](mailto:jcbourne@locklaw.com)>

**Subject:** RE: In re Pork Antitrust Litigation, No. 18-CV-01776-JRT-HB

Kathryn,

Thank you for your correspondence. We disagree with your characterization of our June 1 meet and confer and disagree that Plaintiffs would be responsible for costs associated with the subpoenas. Further, we contend that we have sufficiently explained why your clients could have information highly relevant to this litigation. In light of your

correspondence, we understand you do not intend to image the devices and run search terms on the imaged devices or cloud backup of any messaging apps used by your clients, which we continue to maintain is necessary to conduct a reasonable search.

Best,  
Steve

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**From:** Kathryn Stephens <[kstephens@rockhutchinson.com](mailto:kstephens@rockhutchinson.com)>  
**Sent:** Friday, July 16, 2021 10:29 AM  
**To:** Owen, Stephen M. <[smowen@locklaw.com](mailto:smowen@locklaw.com)>  
**Cc:** John Rock <[jrock@rockhutchinson.com](mailto:jrock@rockhutchinson.com)>; Clark, Brian D. <[bdclark@locklaw.com](mailto:bdclark@locklaw.com)>; Bourne, Joseph C. <[jcbourne@locklaw.com](mailto:jcbourne@locklaw.com)>  
**Subject:** In re Pork Antitrust Litigation, No. 18-CV-01776-JRT-HB

Mr. Owen,

Please see the attached correspondence.

Best,

Kathy Stephens  
Senior Attorney

**ROCK HUTCHINSON**  
business litigation & counsel

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